



March 29, 2021

**“Take Down Notice”
Under the Digital Millennium Copyright Act
17 U.S.C. §512**

Facebook, Inc.
Attn: Facebook Designated Agent
1601 Willow Road
Menlo Park, California 94025
ip@fb.com

VIA FIRST CLASS MAIL AND EMAIL

RE: Copyright Infringement at www.facebook.com


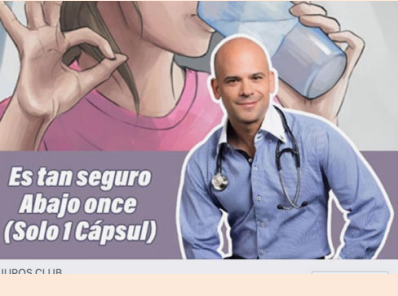

Dear Facebook, Inc.:

We are litigation counsel to Santo Remedio, LLC dba Dr. Juan's Santo Remedio (“Santo Remedio”), whose copyrighted photos/videos have been repeatedly published on Facebook by an unauthorized user and competitor. This letter is a formal notice to you under the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. §512, that your customer(s) is maintaining materials on the webpages listed below, which infringe upon our client’s rights:

- <https://www.facebook.com/2045794338982333/posts/2987162804845477/?d=n>
- <https://www.facebook.com/2121547571258821/posts/3829571023789792/?d=n>
- <https://www.facebook.com/SuccessWellSupported8>
- <https://www.facebook.com/peachvilleplatinumcustomercare/posts/2860745987532106>
- <https://www.facebook.com/ads/library/?id=1356413631406221>
- <https://www.facebook.com/watch/?v=426536488416403>
- <https://www.facebook.com/ads/library/?id=454472999239033>
- <https://www.facebook.com/325085811469828/posts/780472895931115/?d=n>
- <https://www.facebook.com/ads/library/?id=1061860867627108>
- <https://www.facebook.com/ads/library/?id=287967536182238>
- <https://www.facebook.com/2121547571258821/posts/3829571023789792/?d=n>
- <https://www.facebook.com/ads/library/?id=3740931442692746>
- https://www.facebook.com/permalink.php?story_fbid=777506756224054&id=637008440273887
- <https://www.facebook.com/ads/library/?id=820786655486419>
- <https://www.facebook.com/ads/library/?id=426929781709097>
- <https://www.facebook.com/ads/library/?id=152798446584421>
- <https://www.facebook.com/ads/library/?id=449437303050288>
- <https://www.facebook.com/ads/library/?id=126635126042009>

Our client’s affidavit in support of this notice is attached, and below are examples of the unlawful infringement:

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<p>Our client's website with its copyright: https://misantoremedio.com/</p>	<p>Example of infringing post/ad: https://www.facebook.com/2045794338982333/posts/2987162804845477/?d=n</p>	<p>Example of infringing post/ad: https://www.facebook.com/2121547571258821/posts/3829571023789792/?d=n</p>
		

Should the infringing sites continue to infringe on our client's copyright, our client will have no other option but to seek any and all legal remedies available to it, including court intervention.

As you are likely aware, the DMCA does not provide for any grace period or allow a service provider to "mediate" a dispute. Accordingly, **we hereby request that you immediately take down and remove the infringing content from your servers**, pursuant to the attached affidavit.


Please notify me immediately of your receipt of this letter—by return email to liana@KRInternetLaw.com—to confirm that you will comply with the above-stated request. In the event that you and your customer continue to publish and distribute the infringing content or continue to unlawfully exploit our client's copyrights or other rights in any other way, we will take all necessary legal action.

This letter does not constitute a complete or exhaustive statement of all of our client's rights, claims, contentions, or legal theories regarding this matter. Nothing stated herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of our client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

If you should have any questions about this notice, please contact me immediately at 415-955-1155, ext. 118, or at liana@KRInternetLaw.com.

Sincerely,

KRONENBERGER ROSENFELD, LLP


Liana W. Chen

Attachment (Affidavit)

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Affidavit in Support of DMCA Take-Down Notice

I, Jozef Opdeweegh, co-owner and agent of Santo Remedio, LLC dba Dr. Juan's Santo Remedio, declare the following:

1. **Authority to Act.** I swear, under penalty of perjury, that the information in this notification is accurate, as evidenced by my signature below.
2. **Identity of the Copyrighted Work That Has Been Infringed.** I am the copyright owner or am authorized to act on behalf of the owner of the copyright of Dr. Juan Rivera that appears at the following location/link and the other copyrights in photographs/videos of Dr. Juan Rivera used by the infringer in the links in paragraph 3 below:
 - <https://misantoremedio.com/>
3. **Identity of the Material that is Infringing Copyrighted Work.** The webpages/posts located at the following URLs are displaying materials that infringe on the identified copyrights, including by directly copying the photographs/videos of Dr. Juan Rivera:
 - <https://www.facebook.com/2045794338982333/posts/2987162804845477/?d=n>
 - <https://www.facebook.com/2121547571258821/posts/3829571023789792/?d=n>
 - <https://www.facebook.com/SuccessWellSupported8>
 - <https://www.facebook.com/peachvilleplatinumcustomercare/posts/2860745987532106>
 - <https://www.facebook.com/ads/library/?id=1356413631406221>
 - <https://www.facebook.com/watch/?v=426536488416403>
 - <https://www.facebook.com/ads/library/?id=454472999239033>
 - <https://www.facebook.com/325085811469828/posts/780472895931115/?d=n>
 - <https://www.facebook.com/ads/library/?id=1061860867627108>
 - <https://www.facebook.com/ads/library/?id=287967536182238>
 - <https://www.facebook.com/2121547571258821/posts/3829571023789792/?d=n>
 - <https://www.facebook.com/ads/library/?id=3740931442692746>
 - https://www.facebook.com/permalink.php?story_fbid=777506756224054&id=637008440273887
 - <https://www.facebook.com/ads/library/?id=820786655486419>
 - <https://www.facebook.com/ads/library/?id=426929781709097>
 - <https://www.facebook.com/ads/library/?id=152798446584421>
 - <https://www.facebook.com/ads/library/?id=449437303050288>
 - <https://www.facebook.com/ads/library/?id=126635126042009>
4. **Contact Information.** Please send all correspondence on this matter to my attorney at:

Liana W. Chen
KRONENBERGER ROSENFELD, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
UNITED STATES
(415) 955-1155 ext. 118
(415) 955-1158 Fax
liana@KRInternetLaw.com

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5. **Good Faith Statement.** I have a good faith belief that use of the copyrighted material described in the attached letter and herein, which appears on the infringing webpages as described herein, is not authorized by the copyright owner, its agent, or the law.
6. **Representation of Accuracy.** I declare under penalty of perjury under the laws of the State of California that the information in this notification is accurate and that I am authorized to act on behalf of the owner of the exclusive right that is infringed.

DATED: March 29, 2021

Jozef J. Opdeweegh
Jozef J. Opdeweegh (Mar 29, 2021 13:53 EDT)

Jozef Opdeweegh